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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 19-0280 RS (TSH)
)	
Plaintiff,)	GOVERNMENT'S STATUS CONFERENCE
)	STATEMENT
v.)	
)	
ROGELIO BELLOSO ALEMAN, et al.,)	
)	
Defendants.)	

1 The parties last appeared before this Court on February 18, 2021 for a discovery status hearing.
2 At that hearing, the Court stated that it would hold a further status hearing on March 11, 2021, following
3 the parties' arguments regarding the defendants' request for early gang expert disclosures. The
4 government submits the following discovery updates to supplement its status report to the Honorable
5 Chief Judge Seeborg filed on March 8, 2021. *See* Dkt. 251.

6 **I. Cell Phone Discovery**

7 The government previously believed that it had produced all the fully imaged electronic devices
8 to the discovery coordinator in this case. When responding to an individual defense counsel's request
9 last week, the government discovered that it inadvertently had not produced images of eight electronic
10 devices that had been seized in March 2020. It is preparing these images for immediate production.

11 The government also obtained a search warrant for 11 new devices last month. These phones are
12 currently going through the imaging process. The images will be produced as soon as possible once
13 they become available.

14 **II. Victim Medical Records**

15 On March 5, 2021, defense counsel asked the government about its timeline to produce victim
16 medical records. The government assumes that this request is to allow defense counsel to start
17 analyzing the extent of victim injuries and begin working with medical experts. The government has
18 both victim safety and privacy concerns with regards to these records, and initially intended to produce
19 these materials with other attorneys' eyes' only materials.

20 In order to strike a balance between the government's concerns and defense counsel's interests,
21 the government is willing to produce redacted copies of victim medical records in a forthcoming
22 production, subject to a protective order that makes the records available only to the defendants'
23 attorneys and their experts.

24 **III. Discovery Cost-Containment**

25 The government has agreed to meet with the discovery coordinator and defense counsel to
26 brainstorm possible cost-containment measures to deal with the large volume of discovery in this case.
27 The meeting is scheduled to occur on Thursday, March 11, 2021 before that day's court hearing.

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IV. Next Court Appearance

Defense counsel has expressed a preference for more regular status conferences, to which the government does not object. The government therefore is available for a status conference in April, but also is willing to set the next date in May if the Court prefers.

DATED: March 10, 2021

_____/s/
ASEEM PADUKONE
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